United States
Consumer Product Safety Commission

MEETING LOG

SUBJECT: ASTM F15.59 Children's Step Stools and Standing Towers Task Group Meeting

FY 24 OP PLAN ENTRY: Children's Folding Chairs and Stools

DATE OF MEETING: 9/24/2024

LOCATION OF MEETING: Virtual/In-Person (CPSC National Product Testing and Evaluation Center, 5 Research Place, Rockville, MD)

CPSC STAFF FILING MEETING LOG: Brad Gordon

FILING DATE: 10/17/2024

CPSC ATTENDEE(S): Jacqueline Campbell (EXRR), Tom Caton (ESMC), Zachary Goldstein (LSM), Brad Gordon (ESMC), Stephen Harsanyi (ESHF), Daniel Taxier (ESMC), and Suad Wanna-Nakamura (HSPP)

NON-CPSC ATTENDEE(S): Please contact ASTM for the full attendee list.

Summary of Meeting:

The ASTM F15.59 Task Group (TG) for Children's Step Stools and Standing Towers met for a two-day conference to discuss updates to the draft standard and product testing.

September 24, 2024 – Standing Towers

Performance Requirements for Standing Towers

The TG discussed proposed amendments to the performance requirements in the draft standard. The TG reached consensus on which weights and which test beam lengths should be included in the performance requirements. The TG also agreed that, for structural integrity testing, the maximum weight used for testing should be 180 lbs. or three (3) times the manufacturer's recommended weight, whichever is greater.

Dynamic Testing

The TG considered the standing surface fatigue test should include dynamic testing. The TG discussed the idea of using cyclic testing, by dropping a weight repeatedly onto the standing surface, to test whether the fasteners (screws, bolts, etc.) of a standing tower can come loose when a child repeatedly jumps up and down on the product. The TG agreed to use dynamic testing with either 60 lbs. or the manufacturer's recommended

weight—whichever is greater.

Structural Integrity for Standing Towers

The TG discussed whether steps, rungs, guardrails, and handles should be tested for structural integrity. The TG also discussed whether there should be a static test or a dynamic test for removable guardrails. No consensus was reached. The TG agreed that there should be dynamic testing of guardrails using ASTM F2373, *Standard Consumer Safety Performance Specification for Public Use Play Equipment for Children 6 Months through 23 Months*.

Guardrail Heights for Standing Towers

The TG considered whether there should be minimum and maximum guardrail heights based on age. CPSC staff provided a brief demonstration using CAMI dolls so the group could compare waist height and guardrail height. The TG considered whether standing towers that have an adjustable platform can have lower guardrail heights. No consensus was reached. The TG also considered that stationary platforms may need to have higher minimum heights. The TG agreed that there should be a minimum guardrail height.

On-Site Testing of Standing Towers

The TG tested a recalled product and found that it failed the requirements for sideways stability but passed the forward and rearward stability tests. The TG also tested the locking mechanism of an exemplar standing tower in accordance with the draft standard. The TG discussed situations where the top of the standing tower separates from the base of the tower. The TG then tested several folding standing towers to see whether they passed the current performance requirements for folding and latching mechanisms.

Warnings in the Draft Standard

The group discussed the warnings presented in the draft standard. One member commented that the warnings should not address marketing and advertising. Another member pointed out that the language directed to marketing and advertising could be put in an appendix. The TG agreed to move the language to an appendix. One member provided updated labels for the group to consider. No consensus was reached.

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September 25, 2024 – Step Stools

Splitting the Draft Standard into Two Separate Standards

The TG discussed how the term “step stool” should be interpreted relative to the term “standing tower”. The TG then looked at specific products and determined whether they should be classified as step stools or as standing towers. CPSC staff suggested that the draft standard be separated into two standards: one for standing towers and the other for step stools. The TG agreed.

Ideas for Testing Step Stools

The TG discussed: (A) whether step stools should be tested on an incline; (B) whether step stools with containment should be tested differently from step stools without containment; and (C) whether footholds and handholds should be tested for stability. The TG then looked at exemplar step stools, located on-site, while considering each of these issues. No consensus was reached.

Maximum Weight for Step Stools

The group discussed whether there should be a maximum weight for step stools. The TG considered using 220 lbs. as the maximum weight and agreed to discuss this idea at the next meeting.

Platform Heights

The TG discussed whether a product should be classified as a step stool or a standing tower based on the product’s platform height. One member proposed that if the product is above a certain height, there should be a requirement for a full barrier. The TG reviewed exemplar step stools and standing towers while considering these ideas. No consensus was reached. The TG also indicated plans to determine how to differentiate requirements for step stools based on platform height and other design considerations.

Marking and Labeling

The TG continued the discussion of marking and labeling requirements for standing towers and began to discuss requirements for step stools. CPSC staff provided several recommendations and agreed to provide the TG with an example warning label before the next meeting. The TG indicated plans to continue developing the marking and labeling requirements, as well as instructional literature requirements.

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Next Steps:

The TG plans to meet October 30, 2024, from 9:00–10:00 AM to continue work on the draft standard. The meeting will be a hybrid meeting: virtual via WebEx; and in-person at CPSC National Product Testing and Evaluation Center, 5 Research Place, Rockville, MD.